

RE: RM-9404

ET-Docket No. 02-98 RM-9404

Notice of Proposed Rule-Making adopted May 2, 2002

In Reply to Comments filed 06/11/02, Adopted 06/19/02, by William E. Bowers re: RM-9404

As a fellow Part 15 Low Frequency experimenter ("Lowfer"), I agree with the commentor in that I believe it would be unfair to effectively "wipe out" present experimenter use of the 160-190 kHz band and to nullify the considerable expenditures of time, funding and resources many Lowfers have invested in the pursuit of their experimental work by permitting use of this band by high power amateur operators (regardless whether their power limit were 200 w, as mentioned by the commentor, or the limit proposed for the 136 kHz band, e.g., 100 w PEP and 1 w EIRP, a relatively insignificant 3 dB difference). The ability to continue work within the scope of Part 15 in most areas would be precluded by default since such operations have no protected status and would likely be "pushed around" the band or forced off of it altogether by incumbent licensed users with high power capability.

Such a situation would be most ironic since as mentioned by the commentor, those utilizing the 160-190 kHz band under Part 15 have for over half a century made significant strides in the state of the weak-signal art and have increased our understanding of LF propagation while new, licensed amateur users, many of whom would be inexperienced in LF operation, would likely have to either reinvent the proverbial wheel, or consult with the Lowfer community on methods and technique, inasmuch as the commentor has suggested that the ARRL is far behind the present level of Lowfer achievement, an assertion with which I concur.

The impressive achievements of Lowfers which have been accomplished within existing regulations are made possible by the development of advanced modulation, demodulation and reception methods and efficient antenna and transmitter designs pioneered by these experimenters. These same techniques may be applicable to other services and further serve to advance communications technology. The level of ingenuity required to make the most of what is permitted under present regulation has fostered refinement, invention and innovation in the highest realization of the amateur's guiding principle to be on the forefront of technology and to work in furtherance of the radio art, and stands in stark contrast to ARRL's comment that (paraphrasing) "The Part 15 restrictions preclude effective experimentation". Indeed, it is difficult to see how allocation of the 160-190 kHz band to the amateur service would greater serve the public interest, convenience and necessity than the present Part 15 authorization currently does.

I am also in agreement with the referenced commentor in that I support the proposal to allocate 135.7-137.8 kHz ("136 kHz" or "2200 meters") to amateur radio. Such allocation, as stated by the commentor, would give licensed amateurs an opportunity to learn about LF operation. Additionally, there are few PLCs operating in this region, as opposed to 160-190 kHz, thus interference potential (a topic of considerable debate in this Proceeding) would be minimized. Further, amateur use of 136 kHz is in line with the present or proposed amateur allocations of many other countries, making international communications possible - while 160-190 kHz is not being considered for such allocation by any other nation - and therefore does not offer the same potential to communicate with peers overseas.

I respectfully urge the Commission to permit the 160-190 kHz band to remain as-is, that is, Part 15-only, and to allocate only the 136 kHz band to the amateur radio service.

Sincerely,

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